

# POSITION STATEMENT

## Information Sharing

As the third sector interface, West Dunbartonshire CVS is committed to promote collaborative working across the third sector and with complementary agencies and bodies, in line with our responsibilities as detailed by the Information Commissioner's Office.

Data protection law enables fair and proportionate data sharing when approached in a fair and proportionate way. By adhering to the ICO data-sharing code we can balance the benefits and risks and implement data sharing. When considering sharing data we will always ensure that we comply with data protection law, have assessed risks using a Data Protection Impact Assessment and where possible, have established a data sharing agreement for the purpose.

To facilitate our day to day work, and in line with our ICO registration, WDCVS maintains a sector contact directory. In securing and recording these details, sector organisations are asked to give their permissions across the following information-sharing categories:

- A. Data can be held by WDCVS for the purposes of its direct work only
- B. Data may be used by WDCVS for the purposes of its direct work and to share information for the purposes of sector engagement, in an anonymised format only
- C. Data, already publicly available, may be shared with/across the sector and its partners, for the purposes of sector engagement.

### **A. Data can be held by WDCVS for the purposes of its direct work only**

Such data, generally the personal data of small community organisations, individual trustees or specific service users, may not be shared outwith WDCVS at any time. While WDCVS acknowledges the limitations this may impose, the data preference of the organisation remains paramount. Data preferences are renewed annually, during the sector census process.

**B. Data may be used by WDCVS for the purposes of its direct work and to share information for the purposes of sector engagement, in an anonymised format only**

Such data, may not be shared outwith WDCVS at any time. However, on request, targeted mailings may be undertaken by WDCVS on behalf of agencies and partners. Such mailings will clearly identify to the recipient organisations, the purpose of the engagement and will include a return email address/telephone number for the requesting agencies, to allow direct contact to be made. This service, within limitations of organisational capacity, will generally be undertaken within 5 working days of the request being made and will incur an administration and/or postage charge.

**C. Data, already publicly available may be shared with/across the sector and its partners, for the purposes of sector engagement.**

Where requests for publicly available and/or sharable information are received, WDCVS will, within the limitations of organisational capacity, seek to provide this within 7 working days. This will include and be limited to the sharing of organisation name, publicly available contact email address and telephone number, postal address (if no email address available) and beneficiary category.